

JAMES P. KEMP, ESQ.  
Nevada Bar No.: 6375  
KEMP & KEMP  
7435 W. Azure Drive, Suite 110  
Las Vegas, NV 89130  
702-258-1183 ph./702-258-6983 fax  
*Attorneys for Plaintiff Donovan McIntosh*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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DONAVAN McINTOSH,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a Municipal  
Corporation and political subdivision of the  
State of Nevada; PAMELA OJEDA in her  
official and/or individual capacities; CLINTON  
RYAN in his official and/or individual  
capacities; ALEJANDRO RODRIGUEZ in his  
official and/or individual capacities; DOES I-X,  
Defendants.

Case No.: 2:21-cv-01505-APG-EJY

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
RESPOND TO DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

**[FIRST REQUEST]**

Pursuant to LR IA 6-1 and LR 26-3, Defendants City of North Las Vegas, Pamela Ojeda, Clinton Ryan, and Alejandro Rodriguez ("Defendants") and Plaintiff Donovan McIntosh ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to extend time for Plaintiff to Respond to Defendants' Motion for Summary Judgment (ECF No. 40) from the current deadline of November 30, 2022 through and including **January 9, 2023**. This is the first request for an extension of this specific deadline. The requested extension is sought in good faith and not for purposes of undue delay. The reasons for the extension are as follows:

1. Pursuant to the court's order there is one more deposition to be taken of the FRCP Rule 30(b)(6) representative of Nevada Family Care and Wellness, the practice of one of

1 Plaintiff's doctors (Dr. Fakhouri). Due to scheduling problems this deposition has been  
2 reset to December 9, 2022. In order to have time to have the deposition transcribed and  
3 distributed, given the time of the year with the holidays in full swing, it would be  
4 reasonable to extend the deadline for the Summary Judgment response until one month  
5 after the deposition takes place.

- 6  
7 2. Additionally, Plaintiff's counsel will be out of the country on a long planned family  
8 commitment from December 17, 2022 through January 4, 2023.

9 Accordingly, additional time after the transcript from the final deposition is obtained and to  
10 account for the holidays is reasonable and the extension to January 9, 2023 should be sufficient.

11 IT IS SO STIPULATED.

12  
13 Dated this 28<sup>th</sup> day of November 2022.

14 KEMP & KEMP

15 /s/ James P. Kemp

16 James P. Kemp, NV Bar No. 6375  
17 jp@kemp-attorneys.com  
7435 W. Azure Drive, Suite 110  
Las Vegas, NV 89130

18 *Attorney for Plaintiff*

Dated this 28<sup>th</sup> day of November 2022.

HONE LAW

15 /s/ Jill Garcia

16 Jill Garcia, NV Bar No. 7805  
17 jgarcia@hone.law  
701 N. Green Valley Parkway, Suite 200  
Henderson, NV 89074

18 *Attorneys for Defendants*

19  
20 **ORDER**

21  
22 IT IS SO ORDERED.

23  
24   
25 UNITED STATES DISTRICT JUDGE

26  
27 Dated: November 30, 2022  
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